

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

SECURE AXCESS, LLC,

Plaintiff

v.

VANGUARD GROUP, INC. and  
VANGUARD MARKETING  
CORPORATION,

Defendants.

Civil Action No. 6:13-cv-00724-LED

JURY

**THE VANGUARD GROUP, INC. AND VANGUARD MARKETING CORPORATION'S  
NOTICE OF NON-OPPOSITION TO STAY PENDING IPR AND CBM**

The Vanguard Group, Inc. and Vanguard Marketing Corporation (collectively “Vanguard”) does not object to the stay that the defendants to Secure Axcess’ other pending cases have requested pending IPR and CBM review of the ‘191 patent in suit. *See* Case Nos. 6:13-cv-00718 (dkt. no. 32), 6:13-cv-00720 (dkt. no. 39), 6:13-cv-00780 (dkt. no. 30), 6:13-cv-00717 (dkt. no. 24), 6:13-cv-00721 (dkt. no. 31), 6:13-cv-00722 (dkt. no. 31), 6:13-cv-00723 (dkt. no. 23), 6:13-cv-00779 (dkt. no. 22), and 6:13-cv-00782 (dkt. no. 27). In the event the Court determines that a stay is appropriate, Vanguard submits that this case should also be stayed during the IPR and CBM proceedings.

Date: April 24, 2014

Respectfully submitted,

/s/ Allen F. Gardner

**POTTER MINTON, P.C.**

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Attorneys for Defendants The Vanguard Group, Inc.  
and Vanguard Marketing Corporation

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on April 24, 2014. Any other counsel of record will be served by First Class U.S. mail on this same date.

/s/ Allen F. Gardner

Allen F. Gardner